

1 DAVID SHRAGA (SBN 229098)
2 KAWAHITO & SHRAGA LLP
3 11845 W. Olympic Blvd. Suite 665
4 Los Angeles, California 90064
5 Telephone: (310) 746-5300
6 Facsimile: (310) 593-2520
7 david@kawahitoshraga.com

8 Attorneys for Defendants
9 MTS HOLDINGS GROUP, INC.,
10 1901 CO. and VITALY RASHKOVAN

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

TIMOTHY DuFOUR AND
KENNETH TANNER, individuals,
on their own behalves and on behalf
of all others similarly situated,

Plaintiff,

vs.

BE., LLC, DYNAMIC
SHOWCASES, LLC, California
limited liability companies,
MONTEREY FINANCIAL
SERVICES, INC., MTS
HOLDINGS GROUP, INC.,
California Corporations, 1901 CO., a
Nevada corporation, BE
MARKETING LIMITED, a private
limited company registered in
England and Wales, ERIK
DeSANDO, BARRY FLACK,
JACOB STEINBECK, VITALY
RASHKOVAN, and DOES 1-100,
inclusive,

Defendants.

CASE NO. 09-03770-CRB

Judge Charles R. Breyer

**STIPULATION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFFS' CLASS ACTION
COMPLAINT**

1 Defendants MTS Holdings Group, Inc., 1901 CO., and Vitaly Rashkovan
2 (“Defendants”) and plaintiffs Timothy DuFour and Kenneth Tanner (“Plaintiffs”)
3 hereby submit this joint stipulation pursuant Local Rule 6-1 of the United States
4 District Court for the Northern District of California and FRCP 6.

5 WHEREAS, Plaintiffs filed the original Complaint in this matter on or about
6 August 17, 2009; and

7 WHEREAS, Plaintiffs have agreed to extend Defendants’ deadline to
8 respond to the Complaint through December 18, 2009; and

9 WHEREAS, the filer of this document, David Shraga, attests that he has
10 obtained the concurrence to the filing of this document by the other signatory
11 hereto, Ethan Preston.

12 IT IS THEREFORE STIPULATED by and among the parties that
13 Defendants’ deadline to respond to Plaintiffs’ Complaint shall be extended through
14 December 18, 2009.

15
16 DATED: November 30, 2009 KAWAHITO & SHRAGA LLP

17
18 By /s/ David Shraga
19 DAVID R. SHRAGA
20 Attorneys for Defendants
21 MTS HOLDINGS GROUP, INC., 1901 CO.
22 and VITALY RASHKOVAN

23
24 DATED: November 30, 2009 PRESTON LAW OFFICES

25 By /s/ Ethan Preson
26 ETHAN PRESTON
27 Attorneys for Plaintiffs
28 TIMOTHY DUFOUR and KENNETH
TANNER

Signed: December 1, 2009

